

IN the United States District Court

For the District of Delaware

Emanuel.H.Jones
plaintiff

Delaware State
Department of Corrections
Warden Williams
Major Williams
Lt Williams
Lt Shyers, Sgt Williams
OFFICERS Baker, Gall
SHARMA

Civil action No
06-773-SLR



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Appointment of Counsel

I Emanuel.H.Jones as the plaintiff in this civil action would like to have appointment of Counsel For the Reasons that Follows.

Counsel can do a Better job cause they know the law pretty well and a Better job conducting discovery.

Knighton V. Watkins, 616 F.2d 795, 799 (5th Cir. 1980)
Jackson V. County of Mclean, 953 F.2d 1070 (7th Cir. 1992)

Whether the case have Merit.

Taboron V. Grace, 6 F.3d at 155

Cooper V. A Sargenti Co Inc, 877 F.2d 170, 173 (2d Cir. 1989)

The plaintiff's ability to investigate the facts
Tabron v. Grace, 6 F.3d at 156

Whether conflicting evidence implicating the need
for cross examination will be important to the
case.

Tabron v. Grace 6, F.3d at 156.

Rayes v. Johnson, 969 F.2d 700, 704 (2nd Cir) 113 S.Ct
658 (1992)

The indigent's ability to present the case
Tabron v. Grace, 6 F.3d at 156

The complexity and difficulty of the case cause
this case have very serious allegations and many
different constitutional violations and many
different witnesses to this case, can the court
please appoint counsel cause this case have
extreme difficulty and may need a high degree of
trial skills based on firm foundation of depositions
and other pretrial discovery and preparation that is
usually beyond the abilities of a prose prisoner

Emanuel H. Jones

SB# 557338

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